

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

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IN RE:

Case No. 09-60264
Chapter 13

BRADLEY E. LEWIS
JEANETTE S. LEWIS

**REQUEST FOR PRODUCTION
OF DOCUMENTS**

Debtor(s)

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BRADLEY E. LEWIS
JEANETTE S. LEWIS

ADVERSARY PROCEEDING
NUMBER: 09-80036-6-dd

Plaintiff(s),

PARTNERS FOR PAYMENT RELIEF, LLC.

Defendant(s)

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Defendant PARTNERS FOR PAYMENT RELIEF, LLC requests plaintiffs, BRADLEY E. LEWIS and JEANETTE S. LEWIS to respond on or before March 15, 2010 to the following requests:

1) That plaintiff produce and permit defendant to inspect and to copy each of the following documents which are or have been in your possession, custody or control, relating to the premises;

(a) Any and all appraisals of the premises.

(b) A current statement of the amount due on any and all liens against the premises as well as a statement as of the date of filing the instant petition.

(c) Any and all documents which the plaintiff believes supports or controvert the allegations in the complaint on which the plaintiff will rely in proving the allegations in the complaint.

(d) Copies of any and all documents that refer to the subject premises and any work, repairs, renovations or improvements thereto including evaluations, estimates and invoices, bills, cancelled checks or evidence of any other payment by you related to improvements or maintenance of the premises.

/s/ Adam E. Mikolay
ADAM E. MIKOLAY, P.C.
By: ADAM E. MIKOLAY

Attorney for PARTNERS FOR
PAYMENT RELIEF, LLC.
90 Merrick Avenue, Suite 501
East Meadow, New York 11554
(516) 222-2050

TO:

David J. Gruenewald, Esq.
Attorney for Plaintiff
P.O. Box 69
Manlius, NY 13104

Bradley S. Lewis
2826 Paris Green
Sauquoit, NY 13456

Jeanette S. Lewis
2826 Paris Green
Sauquoit, NY 13501

GENERAL INSTRUCTIONS AND DEFINITIONS

1. If you cannot supply any document in full after exercising due diligence to secure the document to do so, please so state and fulfill the request to the extent possible, specifying any inability to answer the remainder of any such request and stating all information or knowledge presently available to you concerning the unsupplied portion of said request.

2. If any document production request demands a document which you claim may be withheld due to privilege, work product or any other reason, you shall supply any portion of the request which is not subject to such a claim, and shall indicate with specificity and particularity the basis of said withholding. If any document is withheld, you shall also identify said document by stating its date, author, and each recipient.

3. Each request shall be deemed to call for the production of the original document or documents to the extent that they are in or subject to, directly, or indirectly, the control of the party to whom these requests and/or interrogatories are addressed.

4. Each request shall be considered as including all copies, and to the extent applicable, preliminary drafts of documents that differ in any respect from the original or final draft or from each other (e.g., by reason of differences in form or content or by reason of handwritten notes or comments having been added to one copy of a document, but not on the original copies thereof).

5. If any responsive documents were, but no longer are in the possession, custody or control of the person or entity to whom this

demand is directed, state the disposition of such documents, including, but not limited to, the identity of the person(s) to whom the documents were forwarded, the state of such disposition and the identity, if known, of the person(s) currently in possession of said documents and the current or last known address of said person(s); and if the documents have been destroyed, the date and manner of their destruction, by whom they were destroyed, who authorized such destruction, and for what purpose they were destroyed.

6. Each request herein seeks production of the entire document or thing in its entirety, without expurgation or abbreviation.

7. "Document" or "Documents" means any written, typed, printed, recorded or graphic matter, however produced or reproduced, of any type or description, regardless of origin or location, including without limitation all correspondence, records, tables, charges, analyses, graphs, schedules, reports, memoranda, notes, lists, calendar and diary entries, letters (sent or received), telegrams, telexes, messages (including, but not limited to, reports or telephone conversations and documents), studies, books, periodicals, magazines, booklets, circulars, bulletins, instructions, papers, files, minutes, other communications (including, but not limited to, inter and intra office communications), questionnaires, contracts, memoranda or agreements, assignments, licenses, ledgers, books of accounts, invoices, statements, bills, checks, vouchers, notebooks, receipts, acknowledgments, data processing cards, computer generated matter,

photographs, photographic negatives, phonographic records, tape recordings, wire recordings, video and audio recordings, other mechanical, magnetic or electronic recordings, transcripts, transcripts of logs of any such recordings, all other data compilations from which information can be obtained, or translated if necessary, and any other tangible thing of a similar nature.

8. "Relate(s) to" and "relating to" means constitutes, refers to, reflects, concerns, pertains to, or in any way logically or factually connects with the matter described in a document production request and/or interrogatory.

9. "Communication(s)" means any oral or written statement, admission, denial, inquiry, negotiation, agreement, understanding, dialogue, colloquy, meeting, discussion or conversation, including any transfer of thoughts, opinions, messages, information, facts or ideas between persons or the transfer of data from one location to another by electronic or similar means.

10. "Property", or "premises" shall refer to the land and improvements located at 2826 Paris Green, Sauquoit, New York 13456.

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JEANETTE S. LEWIS

AFFIDAVIT OF SERVICE

Debtor(s)

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BRADLEY E. LEWIS
JEANETTE S. LEWIS

ADVERSARY PROCEEDING
NUMBER: 09-80036-6-dd

Plaintiff(s),

PARTNERS FOR PAYMENT RELIEF, LLC.

Defendant(s)

-----X

STATE OF NEW YORK)
) ss.:
COUNTY OF NASSAU)

Adam E. Mikolay, being duly sworn, deposes and says that deponent is not a party to the action, is over the age of eighteen (18) years and resides at Nassau County, New York.

That on March 11, 2010 deponent served the within REQUEST FOR PRODUCTION OF DOCUMENTS upon the following parties or attorneys for parties who have appeared in this action:

David J. Gruenewald, Esq.
Attorney for Plaintiff
P.O. Box 69
Manlius, NY 13104

Bradley S. Lewis
2826 Paris Green
Sauquoit, NY 13456

Jeanette S. Lewis
2826 Paris Green
Sauquoit, NY 13501

the addresses designated by said attorneys for that purpose by depositing a true copy of same enclosed in a postpaid properly

addressed wrapper by certified mail, return receipt requested, in an official depository under the exclusive care and custody of the United States Post Office Department within the State of New York.

/s/Adam E. Mikolay

Adam E. Mikolay

Sworn to before me
March 12, 2010

/s/ Daniel P. Trunk

Notary Public, State of New York

No. 02TR5028798

Qualified: Nassau County

Commission Expires:6/6/2010

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JEANETTE S. LEWIS

Debtor(s)

BRADLEY E. LEWIS
JEANETTE S. LEWIS

Plaintiff(s),

ADVERSARY PROCEEDING
NUMBER: 09-80036-6-dd

PARTNERS FOR PAYMENT RELIEF, LLC.

Defendant(s)

REQUEST FOR PRODUCTION OF DOCUMENTS

ADAM E. MIKOLAY, P.C.

Attorney for PARTNERS FOR PAYMENT RELIEF, LLC.
90 MERRICK AVENUE
SUITE 501
EAST MEADOW, NEW YORK 11554
(516) 222-2050